IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of
J. Phenix and N. Judge

Filing Date: Herewith

Attorney File No.: 14856-23

Entitled: System and Method For Representing a
Relational Database as a Java Object

Assistant Commissioner for Patents
Alexandria, VA 22313-1450

PETITION TO MAKE SPECIAL UNDER 37 C.F.R. §1.102

SIR:

It is requested that the above-captioned patent application, filed herewith, be granted Special Status for accelerated Examination. As set forth in MPEP §708.02(VIII), such a petition requires: (1) that all claims be directed to a single invention; (2) a pre-examination search; (3) copies of all of the references identified in the search deemed most closely related to the claimed subject matter; (4) a detailed discussion pointing out with particularity how the claimed subject matter is patentable over the references; and (5) the fee set forth in 37 C.F.R. 1.17(h). As presented in more detail below, Applicants have compiled with each of these requirements. Therefore, Applicants respectfully request granting of this petition.

I.   APPLICANTS' CLAIMED INVENTION

Applicants' claimed invention is directed to a method for representing a relational database as an object in an object-oriented operating system comprising providing a reference to a primary key having a one-to-one mapping to a table entry in said relational database, overloading the load method in the object-oriented operating system to load a latest instance of a table entry and overloading a save method in the object-oriented operating system to save an instance of a table entry. Additionally, the method further comprises overloading a remove method in the object-oriented operating system to remove an instance of a table entry. Advantageously, the object-oriented operating system is Java.

II. THE PATENT APPLICATION PRESENTS CLAIMS TO A SINGLE INVENTION

The claims of the patent application filed herewith are directed to a single invention. The current application includes one independent claim. Independent claim 1 is directed to a method to represent a relational database as an object in an object-oriented operating system.

Should the Examiner determine that the claims are not directed to a single invention, Applicants will make an election without traverse according to established telephone-restriction practice, MPEP § 708.02(VII).

III. PRE-EXAMINATION SEARCH

A pre-examination search was performed by the professional search firm of Woolcott LLC ("Woolcott") to locate the U.S. Patents and U.S. Patent Publications relevant to the inventive concept (the "Search"). Woolcott is located at 2001 Jefferson Davis Highway, Suite 411, Arlington, Virginia 22202, Tel: 800.223.9697 and has a web page address of http://www.woolcott.com/index.html.

Copies of Woolcott's Search Report and the identified references are attached. As can be seen from this Search Report, the following classes and subclasses were searched:

Class	Subclasses
707	4, 103R, 104Y, 104X, 103Z

Woolcott pointed out three references deemed most closely related to the claimed subject matter: (A) U.S. Patent Number 6,418,448 B1, which issued July 9, 2002 to Sarkar; (B) U.S. Patent Number 6,456,995 B1, which issued September 24, 2002 to Salo *et al.*; and (C) U.S. Patent Number 6,539,383 B2 which issued March 25, 2003 to Charlet *et al* (herein collectively referred to as the "Relevant References"). Each of the Relevant References is discussed in detail, below.

Woolcott also cited the folloing references as being of interest:

Patent/Publication No.	Inventor	Date
5,899,990	Maritzen et al.	05/04/1999
5,907,846	Berner et al.	05/25/1999
6,081,808	Blackman et al.	06/27/2000
6,163,776	Periwal	12/19/2000
6,173,439	Carlson et al.	01/09/2001
6,279,008	Tug Ng et al.	08/21/2001
6,314,430	Chang	11/06/2001
6,385,618	Ng et al.	05/07/2002

6,396,221	Greef et al.	05/28/2002
6,405,209	Obendorf	06/11/2002
6,418,451	Maimone	07/09/2002
6,477,540	Signh et al.	11/05/2002
6,490,581	Neshatfar et al.	12/03/2002
6,502,104	Fung et al.	12/31/2002
6,539,397	Doan et al.	02/25/2003
6,539,398	Hannan et al.	03/25/2003
20020091702	Mullins	07/11/2002

Foreign Patents

| WO 9503586 | Henninger et al. | 02/02/1995 |
| WO 9634350 | Althoff et al. | 10/31/1996 |

Nothing in this Petition should be construed as an admission that any reference identified in the Search or discussed herein is available as prior art to the above-captioned application.

IV. DETERMINED DISCUSSION OF PATENTABILITY

IV. DETAILED DISCUSSION OF PATENTABILITY

The claimed subject matter of the above-captioned patent application is patentable over the Relevant References. Applicants provide detailed discussion in this Section that points out with particularity how the claimed subject matter is patentable over the Relevant References.

A. U.S. PATENT NUMBER 6,418,448 B1, WHICH ISSUED JULY 9, 2002 TO SARKAR ("SAKAR")

The subject matter of the above-captioned patent application is patentable over Sakar. Among other deficiencies of Sakar, it does not teach or suggest a method for representing a relational database as an object in an object-oriented operating system comprising providing a reference to a primary key having a one-to-one mapping to a table entry in said relational database, overloading the load method in the object-oriented operating system to load a latest instance of a table entry and overloading a save method in the object-oriented operating system to save an instance of a table entry, as recited in Applicants' claims.

Sarkar discloses a method and apparatus for processing markup language specifications for data and metadata used inside multiple related internet documents to navigate, query, and manipulate information from a plurality of object relational databases over the web. Sarkar specifically teaches two distinct stages of SQL computations for a collaborative method of preparation, execution and resolution of an object SQL query over disparate locations of multiple object relational databases on the web.

Because Sarkar does not teach or suggest Applicants' method for representing a relational database as an object in an object-oriented operating system, Applicants' invention as claimed is patentable over Sarkar.

B. U.S. PATENT NUMBER 6,456,995 B1, WHICH ISSUED SEPTEMBER 24, 2002 TO SALO *ET AL.* ("SALO")

The currently-claimed invention is patentable over Salo. Among other deficiencies of Salo, it does not teach or suggest a method for representing a relational database as an object in an object-oriented operating system comprising providing a reference to a primary key having a one-to-one mapping to a table entry in said relational database, overloading the load method in the object-oriented operating system to load a latest instance of a table entry and overloading a save method in the object-oriented operating system to save an instance of a table entry, as recited in Applicants' claims.

Salo teaches a system and method for ordering database operations in a transaction processing system. The operations are first clustered according to the database operation types. Next, the operations are order in the insert list and the delete list. Then the insert, update and delete operations are performed.

Because Salo does not teach or suggest Applicants' method for representing a relational database as an object in an object-oriented operating system, Applicants' invention as claimed is patentable over Salo.

C. U.S. PATENT NUMBER 6,539,383 B2 WHICH ISSUED MARCH 25, 2003 TO CHARLET *ET AL* ("CHARLET")

The currently-claimed invention is patentable over Charlet. Among other deficiencies of Charlet, it does not teach or suggest a method for representing a relational database as an object in an object-oriented operating system comprising providing a reference to a primary key having a one-to-one mapping to a table entry in said relational database, overloading the load method in the object-oriented operating system to load a latest instance of a table entry and overloading a save method in the object-oriented operating system to save an instance of a table entry, as recited in Applicants' claims.

Charlet teaches a method for establishing communication between objects and a relational database using communication and interaction objects. As part of the method, a server

executes a TCP/IP connection that establishes and manages connections between the relational database and the application program.

Because Charlet does not teach or suggest Applicants' method for representing a relational database as an object in an object-oriented operating system, Applicants' invention as claimed is patentable over Charlet.
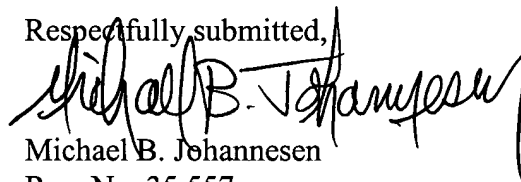
D. OF INTEREST PATENTS AND PUBLICATIONS

The currently-claimed patent application is patentable over the patents listed as being "of interest." None of the "of interest" patents teach or suggest, either alone or taken in combination, a method for representing a relational database as an object in an object-oriented operating system comprising providing a reference to a primary key having a one-to-one mapping to a table entry in said relational database, overloading the load method in the object-oriented operating system to load a latest instance of a table entry and overloading a save method in the object-oriented operating system to save an instance of a table entry, as recited in Applicants' claims. Thus, Applicants' invention as claimed is patentable over the "of interest" references.

V.   CONCLUSION

In view of the foregoing, Applicants' have met all of the requirements for accelerated examination set forth in 37 C.F.R. § 1.102 and detailed in MPEP § 708.02(VIII). Accordingly, Applicants respectfully request this case be made special for expedited examination. Please charge the required fee set forth in 37 C.F.R. § 1.17(h), estimated to be $130.00, to Deposit Account No. 501358.

Respectfully submitted,

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